

**EXHIBIT N**

**Villari, Timothy M.**

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**From:** Clay Thompson <CThompson@mrhfmLaw.com>  
**Sent:** Thursday, May 25, 2023 9:57 PM  
**To:** Wall, Katie L.; Suzanne M. Ratcliffe  
**Cc:** Rasmussen, Mark W.; Torborg, David S.; Villari, Timothy M.  
**Subject:** Re: In re LTL Management LLC, Case No. 23-12825 (MBK), Discovery Correspondence

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Katie,

In the interest of avoiding motion practice, and subject to all objections I lodged previously, I will provide the following information in response to (1) and (2) below, and will provide a formal response by early next week. I'm including my colleagues, Suzanne Ratcliffe and Chris McKean, on this email.

Our firm only handles mesothelioma cases. I believe we have 79 filed and unresolved cases against Johnson & Johnson as of today. Without waiving attorney client privilege and work product objections, I believe we currently have four mesothelioma victims whose claims against J&J have not yet been filed. Each of these are within the SOL for the applicable states where they were exposed and where the case will likely be filed. I object to identifying these individuals on work product and privilege grounds. Given the limited nature of the preliminary injunction, the Debtor will be on notice of any claims filed by MRHFM plaintiffs when these lawsuits are filed.

Regarding (2) below, any communications we have had with our clients regarding the Plan Support Agreement or Proposed Settlement are protected by attorney client privilege. Any communications between lawyers are protected by the work product doctrine.

Having read the motion the Debtor just filed (Dkt. 604), to the extent you are asking for such documents in (2) below, we have no documents related to any assessments or estimates of the Debtor's liability. We do not have documents we intend to use at the hearing on the motions to dismiss that show what we believe the Debtor's total liability to be.

Clay

On May 25, 2023, at 2:09 AM, Wall, Katie L. <klwall@jonesday.com> wrote:

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Clay—

Thank you for your response. To streamline this process, the Debtor proposes that Maune Richle provide the following outstanding information and/or document requests, and the Debtor will not pursue its other discovery requests in connection with the motion to dismiss.

1. Identify or produce documents sufficient to identify the total number of unfiled Talc Claims. (ROG 1, RFP 1)
2. Documents and Communications between your firm and any law firm or claimant concerning the proposed Plan Support Agreement or the Proposed \$8.9 billion Settlement. (RFP 13)

This proposal does not prejudice the Debtor's rights to pursue its remaining discovery requests in connection with other aspects of this case.

Please let us know if you agree to this proposal and/or if you would still like to meet and confer.

Thank you,

Katie Lyons Wall ([bio](#))  
Partner  
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**From:** Clay Thompson <[CThompson@mrhfmlaw.com](mailto:CThompson@mrhfmlaw.com)>  
**Sent:** Monday, May 22, 2023 11:57 AM  
**To:** Villari, Timothy M. <[tvillari@jonesday.com](mailto:tvillari@jonesday.com)>  
**Cc:** Gordon, Gregory M. <[gmgordon@JonesDay.com](mailto:gmgordon@JonesDay.com)>; Prieto, Dan B. <[dbprieto@JonesDay.com](mailto:dbprieto@JonesDay.com)>; Rasmussen, Mark W. <[mrasmussen@jonesday.com](mailto:mrasmussen@jonesday.com)>; Jones, James M. <[jmjoness@JonesDay.com](mailto:jmjoness@JonesDay.com)>; Gottbrecht, Geoffrey N. <[ggottbrecht@jonesday.com](mailto:ggottbrecht@jonesday.com)>; Erens, Brad B. <[bberens@JonesDay.com](mailto:bberens@JonesDay.com)>; Wall, Katie L. <[klwall@jonesday.com](mailto:klwall@jonesday.com)>  
**Subject:** Re: In re LTL Management LLC, Case No. 23-12825 (MBK), Discovery Correspondence

Tim-

I will review your letter. I can speak with you Tuesday afternoon if needed.

On May 22, 2023, at 12:47 PM, Villari, Timothy M. <[tvillari@jonesday.com](mailto:tvillari@jonesday.com)> wrote:

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Counsel,

Please find the attached correspondence and let the Debtor know when you are available for a meet and confer.

Timothy M. Villari  
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<2023-05-22\_Letter from Wall to MRHFM concerning Subpoena and ROG deficiencies.pdf>

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